

My comment is in opposition to the proposed Section 15.240 in the above referenced NPRM.

The proposed rules would permit an average field strength of 11,000 microvolts per meter measured at 3 meters, for continuous periods of two minutes. In the event of a transmission error a retransmission could be initiated immediately; otherwise a silent period of at least 10 seconds would be required. As a practical matter that amounts to continuous operation of a device that could obliterate weak-signal receivers a mile away and cause significant interference to amateur television, FM, and other modes.

It's true that in the event of harmful interference to a licensed station the operator of a Part 15 device is required to eliminate the interference, including ceasing operation if that is the only remedy. However, this presupposes that the source of the interference can be easily located and the operator of the offending device understands this obligation.

In the FCC's own words taken from the NPRM, "The limits are intended to minimize the possibility of unlicensed Part 15 devices causing interference to licensed radio services." The proposal to permit RFID tags in the 70-cm amateur band clearly fails to meet this standard.

Please reconsider this proposed rulemaking, taking into account the many and various contributions to the radio art provided by the Amateur Radio community.